

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE PATTERSON

UNITED STATES OF AMERICA

-v-

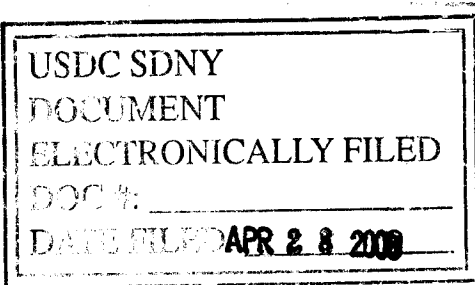
INDICTMENT

08 Cr.

08 CRIM 379

RAYMOND DACOSTA,
a/k/a "Peter Dacosta,"
a/k/a "Rah,"
a/k/a "Indian,"
MALIK INGRAM,
TAKILE INGRAM,
a/k/a "Damian Perry,"
a/k/a "Junior,"
a/k/a "Naeem Smith,"
JULIUS MCLEAN,
a/k/a "Omar McLean,"
a/k/a "Shawn Clarke,"
VALERIE HARRIS,
a/k/a "Valerie Dacosta,"
RICHARDS MEADE,
a/k/a "Kevin Cars,"
a/k/a "Short Man,"
ABIGAIL WALLACE,
a/k/a "Keisha,"
SALEEM JORDAN,
a/k/a "Solomon,"
LYNVAL REECE,
a/k/a "Gansi,"
a/k/a "Terri," and
WINSTON SMITH,
a/k/a "Shadow,"

Defendants.



COUNT ONE

The Grand Jury charges:

1. From in or about August 2007 through in or about
November 2007, in the Southern District of New York and

elsewhere, RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," and MALIK INGRAM, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," and MALIK INGRAM, the defendants, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 50 grams and more of mixtures and substances containing a detectable amount of cocaine base in a form commonly known as "crack," in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(c)(1)(A).

Overt Acts

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about October 22, 2007, RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," and MALIK INGRAM met with another individual in the vicinity of 219th Street and Pauling Avenue in the Bronx.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. From in or about January 2006, up to and including February 2008, in the Southern District of New York and elsewhere, RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," TAKILE INGRAM, a/k/a "Damian Perry," a/k/a "Junior," JULIUS MCLEAN, a/k/a "Omar McLean," VALERIE HARRIS, a/k/a "Valerie Dacosta," and RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," the defendants, and others known and unknown, unlawfully, intentionally and knowingly, did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," TAKILE INGRAM, a/k/a "Damian Perry," a/k/a "Junior," JULIUS MCLEAN, a/k/a "Omar McLean," VALERIE HARRIS, a/k/a "Valerie Dacosta," and RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

Overt Acts

6. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about January 11, 2008, RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," spoke by telephone to JULIUS MCLEAN, a/k/a "Omar McLean," regarding a sale of marijuana.

b. On or about January 15, 2008, RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," met with RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," in the Bronx to discuss an amount of money that DACOSTA owed MEADE for a shipment of marijuana.

c. On or about January 24, 2008, TAKILE INGRAM, a/k/a "Damian Perry," a/k/a "Junior," spoke by telephone to RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," regarding a shipment of twenty pounds of marijuana that TAKILE INGRAM was supposed to receive, but that had been intercepted by law enforcement.

d. On or about February 4, 2008, VALERIE HARRIS, a/k/a "Valerie Dacosta," spoke with RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," regarding a shipment of marijuana.

(Title 21, United States Code, Section 846.)

COUNT THREE

The Grand Jury further charges:

7. From in or about January 2008, up to and including April 2008, in the Southern District of New York and elsewhere, RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," ABIGAIL WALLACE, a/k/a "Keisha," SALEEM JORDAN, a/k/a "Solomon," LYNVAL REECE, a/k/a "Gansi," a/k/a "Terri," and WINSTON SMITH, a/k/a "Shadow," the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

8. It was a part and an object of the conspiracy that RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," ABIGAIL WALLACE, a/k/a "Keisha," SALEEM JORDAN, a/k/a "Solomon," LYNVAL REECE, a/k/a "Gansi," a/k/a "Terri," and WINSTON SMITH, a/k/a "Shadow," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in

violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

9. It was a further part and an object of the conspiracy that RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," ABIGAIL WALLACE, a/k/a "Keisha," SALEEM JORDAN, a/k/a "Solomon," LYNVAL REECE, a/k/a "Gansi," a/k/a "Terri," and WINSTON SMITH, a/k/a "Shadow," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 100 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(B).

Overt Acts

10. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 10, 2008, ABIGAIL WALLACE, a/k/a "Keisha," the defendant, stored thousands of dollars in drug proceeds in her apartment.

b. On or about February 16, 2008, SALEEM JORDAN, a/k/a "Solomon," the defendant, spoke by telephone with RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," the defendant, about a shipment of drugs.

c. On or about April 10, 2008, LYNVAL REECE, a/k/a "Gansi," a/k/a "Terri," the defendant, took several thousand dollars to meet RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," the defendant, and pay him for marijuana.

d. On or about March 31, 2008, WINSTON SMITH, a/k/a "Shadow," the defendant, took several thousand dollars to meet RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," the defendant, and pay him for drugs.

(Title 21, United States Code, Section 846.)

Forfeiture Allegation

11. As a result of committing the controlled substance offenses alleged in Counts One through Three of this Indictment, RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," MALIK INGRAM, TAKILE INGRAM, a/k/a "Damian Perry," a/k/a "Junior," JULIUS MCLEAN, a/k/a "Omar McLean," VALERIE HARRIS, a/k/a "Valerie Dacosta," RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," ABIGAIL WALLACE, a/k/a "Keisha," SALEEM JORDAN, a/k/a "Solomon," LYNVAL REECE, a/k/a "Gansi," a/k/a "Terri," and WINSTON SMITH, a/k/a "Shadow," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the

commission of the violations alleged in this Indictment.

Substitute Asset Provision

12. If any of the above-described forgettable property, as a result of any act or omission of RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian," MALIK INGRAM, TAKILE INGRAM, a/k/a "Damian Perry," a/k/a "Junior," JULIUS MCLEAN, a/k/a "Omar McLean," VALERIE HARRIS, a/k/a "Valerie Dacosta," RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," ABIGAIL WALLACE, a/k/a "Keisha," SALEEM JORDAN, a/k/a "Solomon," LYNVAL REECE, a/k/a "Gansi," a/k/a "Terri," and WINSTON SMITH, a/k/a "Shadow," the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of RAYMOND DACOSTA, a/k/a "Peter Dacosta," a/k/a "Rah," a/k/a "Indian,"

MALIK INGRAM, TAKILE INGRAM, a/k/a "Damian Perry," a/k/a "Junior," JULIUS MCLEAN, a/k/a "Omar McLean," VALERIE HARRIS, a/k/a "Valerie Dacosta," RICHARDS MEADE, a/k/a "Kevin Cars," a/k/a "Short Man," ABIGAIL WALLACE, a/k/a "Keisha," SALEEM JORDAN, a/k/a "Solomon," LYNVAL REECE, a/k/a "Gansi," a/k/a "Terri," and WINSTON SMITH, a/k/a "Shadow," the defendants, up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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(21 U.S.C. § 846)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Sherry Picchioni

Foreperson.
